## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTH DAKOTA

## Criminal No. 3-22-cr-9

United States of America,

Plaintiff,

MOTION TO
CONTINUE TRIAL

DOMINICK JON ROSS,

Defendant.

Dominick Ross's trial is set for August 6, 2024. He requests that the trial be continued for three months so that he can work on a global resolution to resolve this case and also case number 3-22-cr-184.

Counsel has advised Mr. Ross of this motion, its purpose, and his constitutional and statutory right to a speedy trial under 18 U.S.C. § 3161 et seq. Mr. Ross has consented to a continuance and a written consent form will be filed in the coming days. Counsel also represents to the Court this motion is made neither for undue delay nor other improper reason.

The government, through Assistant United States Attorney, Brett Shasky, doesn't object to this motion.

For this reason, Dominick Ross requests that the Court reschedule his trial to the first available date after November 1, 2024.

Dated: July 17, 2024

Respectfully submitted,

**Dane DeKrey (#09524)** 

Ringstrom DeKrey PLLP 814 Center Ave, Suite 5 Moorhead, MN 56560-0853 dane@ringstromdekrey.com